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10 Attorneys for Defendant  
INTUIT INC.

11  
12 UNITED STATES DISTRICT COURT  
13  
14 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

15 **IN RE HIGH-TECH EMPLOYEE**  
16 **ANTITRUST LITIGATION**

17 **THIS DOCUMENT RELATES TO:**  
18 **All Actions**  
19

**Case No. 11-CV-2509 LHK**

**DECLARATION OF CATHERINE T.  
ZENG IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL**

1 I, CATHERINE T. ZENG, declare:

2 1. I am an attorney at law, duly admitted to practice in the State of California and  
3 before this Court. I am an associate at the law firm of Jones Day, counsel for Defendant Intuit  
4 Inc. (“Intuit”) in the above captioned action. I submit this Declaration in support of Defendants’  
5 Joint Response In Support Of Plaintiffs’ Administrative Motion To Seal Portions Of Plaintiffs’  
6 Opposition To Defendants’ Joint Administrative Motion To Supplement The Record And  
7 Declaration Of Edward E. Leamer In Opposition To Defendants’ Administrative Motion. As one  
8 of the attorneys involved in the defense of this action, unless as otherwise stated, I have personal  
9 knowledge of the facts stated in this Declaration and if called as a witness I could and would  
10 testify competently to them.

11 2. I have reviewed the Plaintiffs’ Opposition to Defendants’ Joint Administrative  
12 Motion for Leave to Supplement the Record in Support of their Opposition to the Motion for  
13 Class Certification and Motion to Strike Dr. Leamer’s Expert Report. As described below, the  
14 information requested to be sealed quotes from or describes Intuit’s recruiting methods,  
15 strategies, data, and practices. Intuit has designated this information as “HIGHLY  
16 CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to the Stipulated Protective Order in  
17 this case.

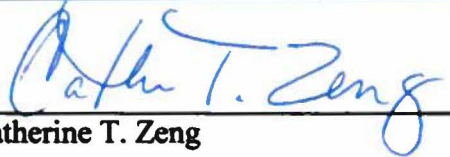
18 3. As noted in the January 22, 2013 Declaration of Lisa K. Borgeson In Support of  
19 Renewed Administrative Motion to File Under Seal (Dkt. No. 285) (“Borgeson Declaration”)  
20 information pertaining to Intuit’s recruiting methods, strategies, practices and data is confidential  
21 and that public dissemination of that information could cause Intuit competitive harm.

22 4. Specifically, Intuit seeks to keep the following redacted portions of the Reply  
23 under seal:

- 24 • Page 3, lines 1-2 quote from the Galy declaration, which is confidential. The quoted  
25 information contains confidential information about Intuit’s confidential recruiting  
26 strategies, methodologies, and practices.

27  
28 I declare under penalty of perjury under the laws of the United States that the foregoing is

1 true and correct. Executed on this 22nd day of January, 2013 in San Francisco, California.

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4 Catherine T. Zeng

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6 SVI-119227  
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